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# Exhibit A

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**From:** Quinn, Rebecca Jo (Law) <rquinn@law.nyc.gov>

**Sent:** Tuesday, July 14, 2020 9:48 AM

**To:** Coles, Anthony P. <anthony.coles@us.dlapiper.com>; Saint-Fort, Dominique (Law) <dosaint@law.nyc.gov>; Saleski, Courtney <Courtney.Saleski@us.dlapiper.com>

**Subject:** RE: Repeal of section 50a of NYS Civil Rights Law

**[EXTERNAL]**

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Thanks for the call in number.

In advance of our call we want you to know that we are inclined to agree to a delay, however we still need confirmation from NYPD. In order to gauge the amount of time we think is appropriate for briefing, we'd like to review your papers. Are you willing to send us a copy today?

Thank you,  
Rebecca

**Rebecca Quinn**  
*Assistant Corporation Counsel*  
Labor & Employment Law Division  
New York City Law Department  
100 Church Street  
New York, NY 10007  
(w) 212-356-4382  
(c) 646-357-0802  
[rquinn@law.nyc.gov](mailto:rquinn@law.nyc.gov)

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**From:** Quinn, Rebecca Jo (Law)  
**Sent:** Tuesday, July 14, 2020 9:26 AM

**To:** 'Coles, Anthony P.'; Saint-Fort, Dominique (Law); Saleski, Courtney

**Subject:** RE: Repeal of section 50a of NYS Civil Rights Law

Good morning, sounds good. We will look out for the call in number.

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**From:** Coles, Anthony P. [<mailto:anthony.coles@dlapiper.com>]

**Sent:** Tuesday, July 14, 2020 9:15 AM

**To:** Quinn, Rebecca Jo (Law); Saint-Fort, Dominique (Law); Saleski, Courtney

**Subject:** RE: Repeal of section 50a of NYS Civil Rights Law

Rebecca, let's have a check in call at 10:15 am– I can send around a call in # to make sure we are communicating smoothly. OK --Tony

**Anthony Coles**

Partner

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**From:** Quinn, Rebecca Jo (Law) <[rquinn@law.nyc.gov](mailto:rquinn@law.nyc.gov)>  
**Sent:** Monday, July 13, 2020 8:00 PM  
**To:** Coles, Anthony P. <[anthony.coles@us.dlapiper.com](mailto:anthony.coles@us.dlapiper.com)>; Saint-Fort, Dominique (Law) <[dosaint@law.nyc.gov](mailto:dosaint@law.nyc.gov)>  
**Subject:** RE: Repeal of section 50a of NYS Civil Rights Law

**[EXTERNAL]**

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Hi Tony, we don't have an answer yet to your request that NYPD delay the release of records pending our discussions regarding briefing. There are a few different decision-makers that need to coordinate. It does not appear that we will have an answer tonight, but we will certainly get in touch as soon as we hear anything.

Thanks,  
Rebecca

**Rebecca Quinn**  
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**From:** Quinn, Rebecca Jo (Law)  
**Sent:** Monday, July 13, 2020 5:16 PM  
**To:** 'Coles, Anthony P.'; Saint-Fort, Dominique (Law)  
**Subject:** RE: Repeal of section 50a of NYS Civil Rights Law

Hi Tony, We want to be clear that we did not yet agree that our clients wouldn't release anything. We are reaching out to them right now to confirm and will get back to you as soon as we can.

Thank you again for reaching out and we will be in touch shortly.

Rebecca

**Rebecca Quinn**  
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(c) 646-357-0802  
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**From:** Coles, Anthony P. [<mailto:anthony.coles@dlapiper.com>]  
**Sent:** Monday, July 13, 2020 5:09 PM  
**To:** Saint-Fort, Dominique (Law)  
**Cc:** Quinn, Rebecca Jo (Law)  
**Subject:** FW: Repeal of section 50a of NYS Civil Rights Law

Thank you – I appreciate the follow up. I now have your correct address, and mis-addressed the below. Best, Tony

**Anthony Coles**  
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**From:** Coles, Anthony P.  
**Sent:** Monday, July 13, 2020 5:01 PM  
**To:** [rquinn@law.nyc.gov](mailto:rquinn@law.nyc.gov); [dsaint-fort@law.nyc.gov](mailto:dsaint-fort@law.nyc.gov)  
**Cc:** [gpestana@law.nyc.gov](mailto:gpestana@law.nyc.gov); [scushman@law.nyc.gov](mailto:scushman@law.nyc.gov); Andrew C. Quinn - Quinn Law Firm ([aquinn@quinnlawnny.com](mailto:aquinn@quinnlawnny.com))  
<[aquinn@quinnlawnny.com](mailto:aquinn@quinnlawnny.com)>; Mike Murray <[MMurray@NYCPBA.org](mailto:MMurray@NYCPBA.org)>; Andrew C. Quinn - Quinn Law Firm  
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<[Courtney.Saleski@us.dlapiper.com](mailto:Courtney.Saleski@us.dlapiper.com)>; [jjohnson@law.nyc.gov](mailto:jjohnson@law.nyc.gov)  
**Subject:** RE: Repeal of section 50a of NYS Civil Rights Law

Dominique and Rebecca:

Thank you for your follow up today on the above.

I look forward to discussing scheduling and any other matters related to a potential claim by my clients, and also am confirming my understanding that, until we have a further

communication, our clients will not commence action, and your client will not proceed with a release.

We also are available to describe our specific concerns about post-50a repeal issues.

Respectfully, Tony

**Anthony Coles**

Partner

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**From:** Coles, Anthony P.  
**Sent:** Monday, July 13, 2020 2:03 PM  
**To:** [jjohnson@law.nyc.gov](mailto:jjohnson@law.nyc.gov)  
**Cc:** [gpestana@law.nyc.gov](mailto:gpestana@law.nyc.gov); [scushman@law.nyc.gov](mailto:scushman@law.nyc.gov); Andrew C. Quinn - Quinn Law Firm ([aquinn@quinnlawny.com](mailto:aquinn@quinnlawny.com)); [<aquinn@quinnlawny.com>](mailto:<aquinn@quinnlawny.com>); Mike Murray <[MMurray@NYCPBA.org](mailto:MMurray@NYCPBA.org)>; Andrew C. Quinn - Quinn Law Firm ([aquinn@quinnlawny.com](mailto:aquinn@quinnlawny.com)) <[aquinn@quinnlawny.com](mailto:aquinn@quinnlawny.com)>; Mike Murray <[MMurray@NYCPBA.org](mailto:MMurray@NYCPBA.org)>; Saleski, Courtney <[Courtney.Saleski@us.dlapiper.com](mailto:Courtney.Saleski@us.dlapiper.com)>  
**Subject:** Repeal of section 50a of NYS Civil Rights Law

Dear Corporation Counsel Johnson,

I am writing on behalf of the five city police associations, the two city firefighters associations and the corrections officers association. As you know, each of these associations has expressed concern about the city's potential release of certain law enforcement files that should be protected regardless of the repeal of section 50a. A number of them have had meetings with their respective agencies to discuss their concerns.

The associations' concerns raise substantial legal issues that may have to be resolved judicially before any release. If that is the case, I would like to proceed in an orderly fashion to make sure that the city has adequate notice of our concerns, as well as any legal filing that seeks provisional relief, and that we try to work out briefing schedules, if necessary, during this unusual time for the courts.

Please let me know of times that you may be available to discuss these issues today, or at your earliest convenience.

Respectfully, Tony Coles

**Anthony Coles**

Partner

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